



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
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ATLANTA, GEORGIA 30303-8960

September 16, 2011

Mr. Brian Smart  
Transportation Planner  
Federal Transit Administration, Region IV  
230 Peachtree Street NW, Suite 800  
Atlanta, Georgia 30303

**SUBJ:** EPA Comments on the Atlanta Beltline Corridor Environmental Study  
Tier 1 Draft Environmental Impact Statement (DEIS)  
City of Atlanta, Fulton County.  
CEQ #: 20110236; ERP #: FTA-E40839-GA

Dear Mr. Smart:

The U.S. Environmental Protection Agency (EPA), Region 4, agreed to act as a cooperating agency for the Atlanta Beltline Project on August 19, 2008. Prior to the submittal of the subject document, EPA Region 4 participated in the Atlanta Beltline interagency kick-off, scoping and technical advisory committee (TAC) meetings. Pursuant to Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA), EPA Region 4 has reviewed the Atlanta Beltline Corridor Study. The Tier 1 Draft Environmental Impact Statement (DEIS) evaluates the Federal Transit Administration (FTA) and the Metropolitan Atlanta Rapid Transit Authority (MARTA) proposal to develop a proposed fixed guideway transit and multi-use trails system within a continuous 22-mile corridor around the Midtown and Downtown Atlanta central business districts.

The proposed transit and trail elements of the Atlanta Beltline are intended to be part of a comprehensive development strategy that connects greenspace, trails, transit and new development along segments of historic railroad corridors. The Atlanta Beltline project combines transportation, affordable housing, Brownfield redevelopment, historic preservation, parks and recreation, and land-use components within its corridor.

The Tier 1 DEIS primarily focuses on three key decisions: the preferred transit mode technology, the general alignment of transit and trails, and the necessary right-of-way (ROW). As a result of our review of the Tier 1 DEIS, EPA provides the following comments:

Transit along the Atlanta Beltline will connect riders to major activity centers that could include the following: Piedmont Hospital, Atlantic Station, Westside Park, and northern access to Peachtree Street. It will also improve transit service and offer improved connections for bus riders, bicyclists, and pedestrians, and support ongoing neighborhood and commercial revitalization in Atlanta.

The development of additional mass transit options and trail systems for resident and workers within the City of Atlanta is a desirable goal. EPA supports this type of project in urban areas because it provides an alternative to the sole reliance on automobiles for transportation demand, and with proper mitigation should result in fewer adverse impacts. From an air quality perspective, enhanced mass transit, bicycle and pedestrian options reduce the amount of air emissions including green house gas emissions in the transportation corridor compared to highway options.

EPA notes that two types of transit technologies, the modern street car (SC) and light rail transit (LTR), are evaluated in the Tier 1 DEIS. While both technological modes can be implemented along the corridor, the Tier 1 DEIS identifies the SC as the preferred mode technology for the Atlanta Beltline because: 1) the SC's capital costs are lower; 2) the vehicle's length provides greater navigation flexibility; and 3) the SC accommodates more frequent stops. The DEIS also indicates that the SC may result in less noise, vibration and land-use impacts than the LTR. After evaluating both transit technologies, EPA supports the use of either technology for this project.

The Tier 1 DEIS also examines five transit alternative alignments (A, B, C, D, and F) and three trail alignments (Howell Junction Trail, Marietta Blvd Trail and On-Street Trail) in the northwest portion of the study area. Two transit alternative alignments (A and C) use portions of the existing CSX freight rail ROW, two transit alternative alignments (B and D) are adjacent to, but outside of, the existing CSX ROW and one transit alternative is adjacent to but outside the existing Norfolk Southern freight rail corridor (F). The rest of the Atlanta Beltline (northeast, southeast, southwest) follows the same transit and trail alignment.

Using alignments within the CSX ROW would minimize the need for additional ROW and reduce the number of impacted parcels. Typically, EPA recommends staying within or following the existing corridor ROW to avoid and minimize environmental impacts to properties and natural resources. However, EPA notes that that CSX Transportation, Inc. is concerned about the alignments located within their railroad ROW. This concern includes the use of its ROW for commuter rail, for trails, or other non-freight use.

The remaining alternative alignments (B, D and F) each provide specific benefits and limitations. Alternative B, which enables transit and trails to remain together and provides connectivity to Piedmont Hospital and northern access to Peachtree Street, potentially impacts 71 parcels along the corridor. Alternative D, which connects to both the most neighborhood and commercial facilities and parks, also connects to other transit services including Bankhead Station and adds the least amount of storm water runoff. This alternative could potentially impact 68 parcels along the corridor. Westside Park, Piedmont Hospital and northern access to Peachtree Street are some of the key destinations along this corridor. Alternative F, the remaining transit alternative, connects to Atlantic Station and results in low biological, ecological, noise, and vibration impacts. This alternative may impact 56 parcels along the corridor and result in cultural resources impacts, more at-grade crossings and service one less economic development focus area. EPA recommends that these issues be taken into consideration when selecting the preferred alignment. The preferred alternative should maximize benefits while minimizing environmental and social impacts. Of the remaining alternatives (B, D and F), EPA also recommend that the Tier 1 FEIS consider Alternatives D or F as the preferred alternative.

The ROW that will be required to build the transit and rail transport can expose neighboring populations to moderate levels of noise. However, noise mitigation strategies can be used to minimize these effects. The potential for decreased private motor vehicle operations along the SC's or the LTR service line because of the service provision could result in lower overall ambient noise levels.

In addition, the ROW that will be required may also impact some surface water resources. The Tier 1 DEIS identifies potential stream crossings by zone (number and type), wetlands and open water bodies in the project area. EPA recommends that the avoidance and minimization of impacts to surface water resources be considered when selecting the preferred alternative.

EPA has active Brownfields Assessment (\$400,000), Revolving Loan Fund (\$1,000,000), Area-Wide Planning Pilot (~\$175,000), and Job Training (\$300,000,) Grants which support assessment and cleanup for underserved neighborhoods, its related redevelopment corridors within the City of Atlanta and the Atlanta Beltline Corridor. Consequently, we support efforts to improve quality of life and redevelop areas in an environmentally responsible manner.

Based on the information provided in the subject document, EPA strongly supports the project. However, we have identified issues related to noise, water resources and socio-economic impacts and therefore rate the Tier 1 DEIS EC-1 (environmental concerns, some additional information requested). We recommend that these issues be addressed in greater detail in the Tier 2 DEIS.

Thank you for the opportunity to comment on this proposed action. We appreciate the opportunity to continue to work with FTA and MARTA as a cooperating agency on this important project. EPA supports projects that are intended to minimize regional sprawl, improve livability while minimizing environmental impacts. If we can be of further assistance, please feel free to contact Ntale Kajumba at (404) 562-9620 or [kajumba.ntale@epa.gov](mailto:kajumba.ntale@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management

Enclosure – Summary of EPA Rating System

cc: Johnny Dunnings, Jr., Senior Director  
MARTA Transit System Planning

## **U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA**

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

### **RATING THE ENVIRONMENTAL IMPACT OF THE ACTION**

**LO (Lack of Objections):** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

**EC (Environmental Concerns):** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

- **EO (Environmental Objections):** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
  1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
  2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
  3. Where there is a violation of an EPA policy declaration;
  4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
  5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- **EU (Environmentally Unsatisfactory):** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
  1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
  2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
  3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

### **RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)**

**1 (Adequate):** The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

- **2 (Insufficient Information):** The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- **3 (Inadequate):** The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.